

Our Ref RAS

Your Ref

Regeneration and Strategy

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Date: 18 October 2019

Miss Katie Child BSc (Hons) MA MRTPI, Planning Inspector
C/o Miny Schofield, Programme Officer

Dear Inspector

Calderdale Local Plan examination

1. I am writing to provide you with a formal update on the progress that has been made by the Council since I wrote to you last on 29 July 2019.
2. A report titled '*Potential modifications to the draft Local Plan following receipt of the Planning Inspector's post-stage 1 hearings letter*' was considered by the Council's Cabinet on 14 October 2019. This letter reflects the outcome of Cabinet's deliberations.
3. The Council's response to your post-stage one hearings letter has been informed by a new study prepared by Turley that uses the most recent demographic and economic participation data to provide updated housing requirement figures for the different scenarios of economic growth. The Turley report also considers the amount of growth that could be supported by the existing housing requirement of 840 dwellings per year.
4. Commentators on the Local Plan have gone into great detail to challenge the underpinning arguments. At the same time the Council has worked to bring forward a document that is both right for Calderdale and that can pass the tests of soundness. The Council has noted your conclusion that our housing requirement needs to align better with our economic ambition and that this is likely to mean a requirement for least 1,001 dwellings per annum. This figure did of course reflect the 2018 Strategic Housing Market Assessment, which was the most up to date information at the time of the hearings.
5. The 2019 Turley study identified a requirement of 1,040 homes per annum to support the 'policy-on plus transport' economic growth forecast. The Council is generally persuaded by the 2019 Turley study; however, whilst logical and methodical, it is inevitably based on various assumptions. It makes assumptions about economic activity, about commuting rates, about population change and household formation rates, about participation rates in the job market



and so on. There is uncertainty about the extent to which these assumptions will hold good for 15 years, and some of these variables are volatile. As you acknowledge in your letter, the relationship between homes and jobs is also complex, and will be influenced by various other factors such as the Council's Inclusive Economic Strategy as well as general national economic growth.

6. Having regard to the narrative set out above, the Council's approach to a housing requirement reflects 'policy-on plus transport' but tempers this to reflect areas of uncertainty. Our calculation is set out below:
 - 10 years @ 1,040 ("policy-on plus transport growth" as per Turley 2019) = 10,400
 - 5 years @ 910 ("baseline growth" as per Turley 2019) = 4,550
 - Total requirement over 15 years = 14,950
 - Average annual requirement = $14,950/15 = 997$ **dwelling per annum** (to the nearest whole number)
7. The Council has taken this position in full recognition of the fact that the Plan will be reviewed at years 5 and 10. The Council also notes that, whilst this figure is based on recently re-calibrated assumptions, it is in any case virtually the same as the 1,001 minimum cited in your letter. We therefore believe that this represents a soundly based assessment of our housing requirement.
8. The Council is cognisant of the importance of demonstrating a 5 year supply of deliverable housing sites at the point of adopting the Local Plan, and also of the need for the boundaries of the Green Belt to endure beyond the period of the Plan. We have therefore reviewed our housing supply in order to align with the revised requirement. The Council has looked at a number of different approaches to housing supply and have settled on what we consider to be the most sustainable approach, which balances the economic, social and environmental dimensions of sustainability. The approach results in some further release of Green Belt; however, this is tempered by placing a stronger emphasis on regeneration of brown field sites, increasing densities on such sites, and more timely delivery of houses on the larger Garden Suburb site. The Council appreciates that you will require us to evidence the position we have taken on housing supply and preparation of this information is in hand.
9. We intend to undertake a consultation on our revised approach as soon as the period for call-in of the Cabinet decision to the Scrutiny Board has expired, or the decision is released following consideration by the Board. (We will obviously notify you in the event of a Scrutiny Board call-in impacting on the decision of Cabinet). We will inform you of the consultation arrangements and dates once they have been finalised. Comments received will be provided to you in collated form shortly after the close of the consultation.
10. I trust that you will agree that we have responded positively and constructively to your conclusions following the stage 1 hearings. We look forward to agreeing the dates for the next stage of hearings; however, please come back to me if you have any further queries.

Yours sincerely

Richard Seaman

Corporate Lead - Planning